

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

LYNNE FREEMAN,

Plaintiff,

v.

TRACY DEEBE-ELKENANEY P/K/A
TRACY WOLFF, et al.,

Defendants.

Case No.: 1:22-cv-02435-LLS-SN

DECLARATION OF BENJAMIN S. HALPERIN

Benjamin S. Halperin declares as follows:

1. I am Counsel with Cowan, DeBaets, Abrahams, & Sheppard LLP, attorneys for defendants Tracy Deebes-Elkenaney p/k/a Tracy Wolff, Entangled Publishing, LLC, Holtzbrinck Publishers, LLC d/b/a MacMillan, and Universal City Studios LLC in the above-captioned matter. I make this declaration in support of Defendants' Motion to Compel Plaintiff Lynne Freeman to produce communications improperly withheld as privileged.

2. Attached hereto as Exhibit A is a true and correct copy of the revised privilege log Plaintiff served on January 23, 2023.

3. Attached hereto as Exhibit B is a true and correct copy of a letter dated January 30, 2023 from me to Mark Passin detailing objections to the revised privilege log.

4. Attached hereto as Exhibit C is a true and correct copy of an email dated January 31, 2023 from Mark Passin to Nancy Wolff, CeCe Cole, Lance Koonce, Zach Press, Dwayne Goetzl, and me and copying Paul LiCalsi and Brett Van Benthysen, providing a supplemental privilege log and a redaction log.

5. Attached hereto as Exhibit D is a true and correct copy of the supplemental privilege log Plaintiff served on January 31, 2023.

6. Attached hereto as Exhibit E is a true and correct copy of the redaction log Plaintiff served on January 31, 2023.

7. Attached hereto as Exhibit F is a true and correct copy of a letter dated February 3, 2023 sent by Mark Passin to me in response to my January 30, 2023 objection letter.

8. Attached hereto as Exhibit G is a true and correct copy of an email exchange with attachments produced by Plaintiff in this action, bearing Bates LF038212-LF038246.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: March 15, 2023
New York, New York


Benjamin S. Halperin